

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

AMERICAN SPIRIT AND CHEER  
ESSENTIALS, INC. by HEIDI  
WEBER, ROCKSTAR  
CHAMPIONSHIPS, LLC by DAVID  
OWENS, JEFF & CRAIG CHEER,  
LLC, d/b/a JEFF AND CRAIG  
CAMPS, by CRAIG HALLMARK,  
MARK LUKENS and KATHLEEN  
LUKENS, and ASHLEY HAYGOOD,  
Individually and on Behalf of all Others  
Similarly Situated,

Plaintiffs,

v.

VARSITY BRANDS, LLC, BSN  
SPORTS, LLC, VARSITY SPIRIT  
LLC, HERFF JONES, LLC, VARSITY  
BRANDS HOLDING CO., INC.,  
VARSITY SPIRIT FASHION &  
SUPPLIES, LLC, U.S. ALL STAR  
FEDERATION, INC., USA  
FEDERATION FOR SPORT  
CHEERING, d/b/a USA CHEER,  
VARSITY INTROPA TOURS, LLC  
and JEFF WEBB,

Defendants.

CIVIL ACTION  
FILE NUMBER:

2:20-cv-02782-SHL-tmp

**CLASS ACTION  
ATTACHMENT A**

## **REQUEST FOR DOCUMENTS**

What we hope to get from you is just basic information. Of particular importance are any contracts or documents showing any of these companies made “exclusive dealing” arrangements. Exclusive dealing arrangement are where a company agrees to serve you on the condition that (1) you buy the offered goods/services from them and not others; or (2) you buy a large share of your requirements from them. Thank you in advance for whatever help you can provide. Hopefully, in time we will be able to help you, growing American businesses, students, and parents!

### **REQUESTS**

1.

Any agreement or contracts between your organization (or any organization you oversee) and any of these companies in the past 7 years:

- (1) VARSITY BRANDS, LLC
- (2) BSN SPORTS
- (3) VARSITY SPIRIT, LLC
- (4) VARSITY BRANDS HOLDING CO., INC.
- (5) VARSITY SPIRIT FASHION & SUPPLIES
- (6) USA FEDERATION FOR SPORT CHEERING d/b/a USA CHEER

Involving **athletic goods or services, cheerleading goods or services, or uniforms** used in the scholastic setting.

2.

Some documentation showing how much of these items your organization—or your member-schools or parents or students of your member-schools—purchased from these companies over the past 7 years.

3.

Any documentation or agreements entered into with any of the companies mentioned in number 1 herein above, for any “All School” or “Impact Program” sales or services offered by them for the years 2015 to the present.

4.

Some documentation showing the name and contact information for the person or persons primarily responsible for making *any* agreements with these companies at your organization or in your member-schools (if applicable).

To respond, feel free to

(1) email documents to: AMSpiritLitigation@falangalaw.com

(2) mail documents to: LAW OFFICES  
FALANGA & CHALKER  
ATTN: American Spirit Team  
11200 Atlantis Place, Suite C  
Alpharetta, GA 30022

OR

(3) contact the requesting attorney for a hand-delivery location within 100 miles of your address.

Respectfully submitted,

/s/ Robert A. Falanga  
Mr. Robert A. Falanga, Esq.  
Georgia Bar No. 254400

/s/ Kobelah Svensen Bennah  
Kobelah Svensen Bennah  
Georgia Bar No. 378113

LAW OFFICES  
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